

ESTTA Tracking number: **ESTTA560685**

Filing date: **09/22/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91210282
Party	Defendant Stockmarket Burger, Inc.
Correspondence Address	TIANJIAO GU STOCKMARKET BURGER INC 13603 MARINA POINTE DRIVE APT C520 MARINA DEL REY, CA 90292-5598 UNITED STATES temygu207@gmail.com, temy@novelaffairs.com
Submission	Other Motions/Papers
Filer's Name	TIANJIAO GU
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Signature	/TIANJIAO GU/
Date	09/22/2013
Attachments	Motion to Extend_Discovery.pdf(106797 bytes)

Dated September 20, 2013

Applicant:
Stockmarket Burger, Inc.
13603 Marina Pointe Drive C520
Marina Del Rey, CA 90292

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Red Bull GmbH)	Opposition No.: 91210282
)	Serial No.: 85680816
)	
Opposer)	
vs.)	MOTION FOR EXTENSION OF TIME
)	FOR DISCOVERY CONFERENCE AND
Stockmarket Burger, Inc.)	DISCOVERY OPEN
)	
)	
Applicant)	

Dated this 20th day of September, 2013

Opposer:
Red Bull GmbH
TechMark a Law Corporation
4820 Harwood Road, 2nd Floor
San Jose, CA 95124

Martin R. Greenstein
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Dated September 20, 2013

**MOTION FOR EXTENSION OF TIME
TO ANSWER NOTICE OF OPPOSITION**

Applicant, Stockmarket Burger, Inc., respectfully files this motion for an extension of time of 60 days to begin Discovery with Red Bull GmbH, represented by TechMark a Law Corporation.

Good cause exists to justify this extension because the Applicant, Stockmarket Burger, Inc. needs additional time to consult with counsel with regard to the case. The key stakeholder does not speak or understand English and would require more time to understand the discovery process.

The Discovery Conference is currently due by September 23rd, 2013 and Discovery opens on the same date. With this extension, Discovery should begin on November 22nd, 2013 with a Discovery Conference due by the same date.

Stockmarket Burger, Inc. respectfully asks that this Extension of Time to begin Discovery be granted with the following proposed schedule:

Deadline for Discovery Conference	11/22/2013
Discovery Opens	11/22/2013
Initial Discovery Due	12/22/2013
Expert Disclosure Due	4/20/2014
Discovery Closes	5/20/2014
Plaintiff's Pretrial Disclosures	7/6/2014
Plaintiff's 30-day Trial Period Ends	8/20/2014
Defendant's Pretrial Disclosures	9/5/2014
Defendant's 30-day Trial Period Ends	10/19/2014
Plaintiff's Rebuttal Disclosures	11/3/2014
Plaintiff's 15-day Rebuttal Period Ends	12/3/2014

Stockmarket Burger, Inc.
13603 Marina Pointe Drive C520
Marina Del Rey, CA 90292
Tel: 714-262-3549
Email: temy@novelaffairs.com

Dated September 20, 2013

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of September, 2013, a Motion for Extension of Time To begin Discovery is being filed electronically on the Trademark Trials and Appeals website via ESTTA, and a copy of such filing is being mailed to the opposing party at the address shown on the USPTO website:

Red Bull GmbH | Martin R. Greenstein
TechMark a Law Corporation
4820 Harwood Road, 2nd Floor
San Jose, CA 9124

/TIANJIAO GU/
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